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*Attorneys for Plaintiffs*

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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 PETER CASTLEMAN and SLOANE  
11 CASTLEMAN, individually and as husband  
12 and wife

13 Plaintiffs,

14 vs.

15 ELLEN CONDREN CROWLEY,

16 Defendant.

Case No.:

**COMPLAINT**

17  
18 COME NOW, Plaintiffs Peter Castleman and Sloane Castleman, above named by  
19 and through their attorneys Clayton P. Brust and Brett W. Pilling of the firm of Robison,  
20 Sharp, Sullivan & Brust, and hereby alleges as follows:

21 **PARTIES AND JURISDICTION**

- 22 1. Plaintiff Peter Castleman is a resident of Glenbrook, Nevada.
- 23 2. Plaintiff Sloane Castleman is a resident of Glenbrook, Nevada.
- 24 3. Defendant Ellen Condren Crowley is a resident of Chagrin Falls, Ohio.
- 25 4. All wrongful acts alleged herein were done by Ellen Condren Crowley and
- 26 were specifically directed to Plaintiffs in Nevada. All, or a substantial part of, the damages
- 27 caused by Ellen Condren Crowley occurred in Nevada and will occur in Nevada in the
- 28 future.



1 otherwise invade the well-established privacy rights of Plaintiffs and Sloane Castleman's  
2 family members.

3 14. On April 29, 2021, Defendant threatened to report the untrue and damaging  
4 statements about Plaintiffs to Defendant's friend who is an editor of the New York Times.  
5 Defendant included a direct reference to Plaintiffs as her "billionaire brother-in-law  
6 married to Ralph Lauren model (sister)" and threatened to falsely accuse them of  
7 disparaging conduct and suggesting that Defendant would only stop if Plaintiffs' forgave  
8 the loans to Defendant. (The false accusations Defendant made and threatens to publish  
9 as described throughout this pleading are too salacious for public record and the dignity  
10 of this Court. Plaintiffs will submit the emails at issue, written by Defendant to Plaintiffs  
11 in Nevada, under seal to the Court after appropriate protections are in place.)

12 15. On May 8, 2021, Defendant sent another email to Plaintiffs in Nevada  
13 threatening to make additional defamatory, untrue, and salacious comments if Plaintiffs  
14 did not forgive the loans they made to Defendant.

15 16. On June 27, 2021, Defendant stated that she had published defamatory  
16 comments to a documentary filmmaker and was in the process of developing a film that  
17 would place Plaintiffs in false light and defame them. Defendant again demanded that  
18 Plaintiffs provide her financial support or suffer the consequences of Defendant's wrongful  
19 conduct.

20 17. On August 11, 2021, Defendant fabricated additional defamatory  
21 statements about Plaintiffs and again made threats to them in Nevada to publish the  
22 statements if Plaintiffs did not provide Defendant loan forgiveness and financial support.

23 18. On August 11, 2021, Defendant confirmed that Defendant had published  
24 false and defamatory statements to members of the family and requested financial  
25 support from Plaintiffs.

26 19. On September 12, 2021, Defendant sent correspondence to Plaintiffs in  
27 Nevada and represented that she was shopping her untrue defamatory statements to  
28 high profile film-makers, reiterated that Plaintiffs are billionaires, and demanded payment

1 to refrain from trying to defame Plaintiffs and place them in false light.

2 20. On September 28, 2021, Defendant again directed communications to  
3 Nevada that demanded money from Plaintiffs, and fabricated new false statements she  
4 threatened to make about Plaintiffs.

5 21. On December 25, 2021, Defendant again directed to Plaintiffs in Nevada  
6 threatening and harassing statements and threatened to cause disparaging publications  
7 to made about Plaintiffs. These communications were again linked to financial assistance  
8 from Plaintiffs.

9 22. Defendant's actions described above are a pattern of illegal, damaging,  
10 extortionist, defamatory, and wrongful behavior directed to Plaintiffs in Nevada and  
11 intentionally designed to coerce Plaintiffs into paying Defendant money and/or forgive  
12 debts owed by Defendant to Plaintiffs.

13 23. Plaintiffs' business interests and reputations are such that publication of the  
14 statements by Defendant has already caused Plaintiffs' damages in excess of \$75,000,  
15 and likely in excess of \$1,000,000. Further, Defendant's threatened disclosures of false  
16 and misleading statements will cause Plaintiffs damages in excess of millions of dollars.

17 **CLAIMS FOR RELIEF**

18 **First Claim For Relief**  
19 **Intentional Infliction of Emotional Distress/Outrage**

20 24. Plaintiffs incorporate all allegations set forth above as if set forth herein.

21 25. Defendant's conduct was extreme or outrageous with either the intention of,  
22 or reckless disregard for, causing emotional distress to Plaintiffs.

23 26. Plaintiffs suffered severe or extreme emotional distress as the actual or  
24 proximate result of Defendant's conduct.

25 27. Defendant's actions were conducted with a conscious disregard for  
26 Plaintiffs' rights and with the intent to vex, injure, and annoy Plaintiffs such as to constitute  
27 oppression, fraud, or malice, entitling Plaintiffs to exemplary or punitive damages.  
28 Further, Plaintiffs are entitled to recovery attorney fees and costs.

**Second Claim For Relief  
Defamation**

28. Plaintiffs incorporate all allegations set forth above as if set forth herein.

29. Defendant made false and defamatory statements concerning Plaintiffs.

30. Defendant's statements were unprivileged and were made to third persons.

31. Defendant knew, or should have known, the statements were false.

32. Plaintiffs sustained actual or presumed damages as a result of Defendant's false statements.

33. Defendant's actions were conducted with a conscious disregard for Plaintiffs' rights and with the intent to vex, injure, and annoy Plaintiffs such as to constitute oppression, fraud, or malice, entitling Plaintiffs to exemplary or punitive damages. Further, Plaintiffs are entitled to recovery attorney fees and costs.

**Third Claim For Relief  
False Light**

34. Plaintiffs incorporate all allegations set forth above as if set forth herein.

35. Defendant gave publicity to a matter concerning Plaintiffs that placed Plaintiffs before the public in a false light.

36. The false light under which Plaintiffs were placed would be highly offensive to a reasonable person.

37. Defendant had knowledge of or acted in reckless disregard as to the falsity of the publicized matter and false light in which Plaintiffs were placed.

38. Plaintiffs suffered damages as a result of Defendant's actions.

39. Defendant's actions were conducted with a conscious disregard for Plaintiffs' rights and with the intent to vex, injure, and annoy Plaintiffs such as to constitute oppression, fraud, or malice, entitling Plaintiffs to exemplary or punitive damages. Further, Plaintiffs are entitled to recovery attorney fees and costs.

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**Fourth Claim For Relief  
Public Disclosure of Private Facts**

40. Plaintiffs incorporate all allegations set forth above as if set forth herein.

41. Defendant publicly disclosed private facts of Plaintiffs.

42. Defendant's disclosures would be offensive and objectionable to a reasonable person of ordinary sensibilities.

43. Plaintiffs have been damaged by Defendant's disclosures.

44. Defendant's actions were conducted with a conscious disregard for Plaintiffs' rights and with the intent to vex, injure, and annoy Plaintiffs such as to constitute oppression, fraud, or malice, entitling Plaintiffs to exemplary or punitive damages. Further, Plaintiffs are entitled to recovery attorney fees and costs.

**PRAYER**

Whereby Plaintiffs pray for judgment against Defendant as follows:

1. For an award of general and special damages in an amount to be established at trial;

2. For exemplary or punitive damages according to proof at the time of trial;

3. For costs of suit, including reasonable attorneys' fees, incurred herein;

4. For injunctive relief prohibiting Defendant from extorting and threatening Plaintiffs, and from making false statements about Plaintiffs to third parties; and

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1           5.       For such other and further relief as the Court deems just and proper.

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3                               **AFFIRMATION**  
4                               **Pursuant to NRS 239B.030**

5           The undersigned does hereby affirm that this document does not contain the  
6       Social Security Number of any person.

7           DATED this 28<sup>th</sup> day of December, 2021.

8                               ROBISON, SHARP, SULLIVAN & BRUST  
9                               A Professional Corporation  
10                              71 Washington Street  
                                Reno, Nevada 89503

11                              BY: /s/ Clayton P. Brust  
12                              CLAYTON P. BRUST, ESQ.  
13                              BRETT W. PILLING, ESQ.  
14                              Attorneys for Plaintiffs

JS 44 (Rev. 10/20)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

PETER CASTLEMAN and SLOANE CASTLEMAN

(b) County of Residence of First Listed Plaintiff Douglas  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

ROBISON, SHARP, SULLIVAN & BRUST  
71 Washington Street, Reno, NV 89503 / 775-329-3151**DEFENDANTS**

ELLEN CONDREN CROWLEY

County of Residence of First Listed Defendant Washoe  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☒ 1 PTF ☐ 1 DEF ☐ 1 Incorporated or Principal Place of Business In This State ☐ 4 PTF ☐ 4 DEF
- Citizen of Another State ☐ 2 ☒ 2 PTF ☐ 2 DEF ☐ 2 Incorporated and Principal Place of Business In Another State ☐ 5 PTF ☐ 5 DEF
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 PTF ☐ 6 DEF

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 USC §1332

Brief description of cause:

Slander and libel against Plaintiffs

**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

12/28/21

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE